

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

MONTRELL KILPATRICK,)
)
Plaintiff,)
)
v.) **CIVIL ACTION NO. 3:17-cv-00670**
)
)
HCA HUMAN RESOURCES, LLC,) **DISTRICT JUDGE CAMPBELL**
)
Defendant.) **MAGISTRATE JUDGE NEWBERN**
)

**AFFIDAVIT OF FLYNNE M. DOWDY IN SUPPORT OF
DEFENDANT'S BILL OF COSTS**

STATE OF TENNESSEE)
) ss.
COUNTY OF DAVIDSON)

I, Flynnne M. Dowdy, being over the age of 18 and being duly sworn, hereby affirm under penalty of perjury the facts stated herein are true and correct to the best of my knowledge, information and belief and state as follows:

1. I am an associate in the law firm of Waller Lansden Dortch & Davis, LLP, for the Defendant HCA Human Resources, LLC. I submit this affidavit to set forth the costs that Defendant has incurred for its legal representation in this action. I have personal knowledge of the costs incurred based upon my review of our law firm's accounting records, which reflect them as and when they have been incurred, and whether such costs were reasonable for the items reflected.

2. In defending this action, Defendant has incurred a total of \$4,223.90 in recoverable costs, excluding its attorney's fees, which it seeks to recover from the named Plaintiff Montrell

Kilpatrick. I have placed these in separate categories in paragraphs 3 through 12 below, which track form AD 133 (Rev. 12/09) filed contemporaneously herewith.

Fees of the Clerk

3. There are no Fees of the Clerk

Fees for the service of summons and subpoena

4. There are no fees for service of summons and subpoenas.

Fees for printed or electronically recorded transcripts necessarily obtained for use in the case

5. Attached as Exhibit A are copies of two invoices from Anne S. Wilson & Associates: the first dated September 11, 2018 in the amount of \$2,809.00 and the second dated October 12, 2021 in the amount of \$466.50, respectively, for printed or electronically recorded testimony transcripts necessarily obtained for use in the case. These total \$3,275.50.

Fees and disbursements for printing

6. Attached as Exhibit B are copies of four invoices. The first is from Ciox Health dated June 23, 2018, in the amount of \$176.50 for documents produced. The second is from Randstad dated September 12, 2018, in the amount of \$25.00 for documents produced. The third is from Ciox Health dated October 21, 2021, in the amount of \$293.00 for documents produced. The fourth is from Sharecare Health Data Services, LLC dated February 11, 2022, in the amount of \$73.30 for documents produced. These four invoices total \$567.80.

Fees for witnesses

7. There are no fees for witnesses.

Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case

8. There are no fees for the exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.

Docket fees under 28 U.S.C. § 1923

9. There are no Docket fees under 28 U.S.C. § 1923.

Costs as shown on Mandate of Court of Appeals

10. There are no Costs as shown on Mandate of the Court of Appeals.

Compensation of court-appointed experts

11. There was no compensation of court-appointed experts.

Compensation of interpreters and costs of special interpretation services under 28 U.S.C. § 1828

12. There was no compensation of interpreters or costs of special interpretation services under 28 U.S.C. § 1828.

Other costs

11. Attached as Exhibit C is a list of photocopies that have been made during the course of this case. These total \$280.60.

12. Attached as Exhibit D is a list of the costs incurred for delivery services used during the course of this case. These total \$20.00.

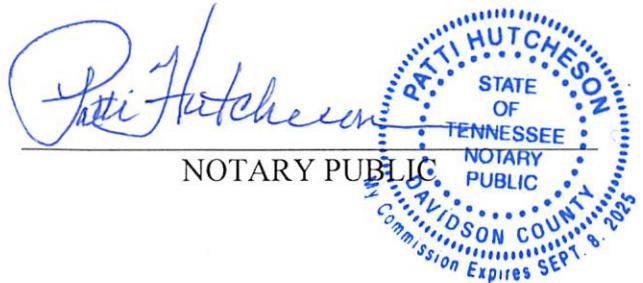
FURTHER AFFIANT SAYETH NAUGHT.

Dowdy
Flynne M. Dowdy

Subscribed and sworn to before me this 22 of April, 2022 by

Flynne M. Dowdy

Witness my hand and official seal.



CERTIFICATE OF SERVICE

I certify that on April 22, 2022, the foregoing Affidavit of Flynn M. Dowdy in Support of Defendant's Bill of Costs was filed electronically with the Clerk or the Court using the court's CM/ECF filing system, which is expected to send notification of such filing to the following counsel of record:

Constance F. Mann
The Law Offices of Constance F. Mann
1107 Battlewood Street
Franklin, TN 37069

/s/ Flynn M. Dowdy _____